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October 18, 2019

VIA ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Giuffre v. Dershowitz*, Case No. 19-Civ-3377-LAP**
Request for Adjournment of Rule 16 Conference

Dear Judge Preska,

Defendant Alan Dershowitz ("Mr. Dershowitz") respectfully writes the Court in regard to your Honor's order [Dkt. No. 67] scheduling a Rule 16 conference on November 20, 2019 at 11:00 A.M.

Counsel for Mr. Dershowitz respectfully request a brief adjournment of the November 20 Rule 16 Conference to December 2, 2019. This request is made due to the unavailability of counsel, Arthur L. Aidala, and myself, Imran H. Ansari, because of the necessity to travel abroad for business purposes from November 14 - 24, 2019. This is our first request for an adjournment of the Rule 16 conference.

In the interim, Mr. Dershowitz will file his Answer to the Plaintiff's Complaint and assert Counterclaims for defamation and other tortious conduct against the Plaintiff seeking substantial damages. The additional time will allow Plaintiff to confer with her new counsel about the full scope of this case, and will allow counsel for both parties to confer more meaningfully about the discovery which will be necessary for summary judgment and trial.

As we have not yet received successor counsel for Plaintiff's notice of appearance, we are copying outgoing counsel Boies Schiller Flexner, LLP on this correspondence so that they may inform the Plaintiff of the request made herein. Upon receipt of successor counsel for Plaintiff's notice of appearance, we shall promptly contact them to confer on a proposed discovery plan, which is currently mandated to be filed by November 13, 2019, pursuant to your Honor's order.

Respectfully Submitted,


Imran H. Ansari

CC: Plaintiff/BSF via ECF